

EUGENE D. ROTH, ESQUIRE - 4239
VALLEY PARK EAST
2520 HIGHWAY 35, SUITE 307
MANASQUAN, NEW JERSEY 08736
(732) 292-9288
Attorney for Debtors

In the Matter of:	UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
ERNESTO L. ARANA AND MEGAN L YOUNG	Chapter 13
Debtors	Case No. 17-19726 (JKS)
	Hearing Date: 7/31/2018
	Honorable: John K. Sherwood

CERTIFICATION IN OPPOSITION TO MOTION TO FOR RELIEF FROM STAY

Ernesto Arana. of full age hereby certifies and says:

1. I am a Co-Debtor in the above captioned Chapter 11 case and as such I am fully familiar with the facts contained herein. I make this certification in opposition to the Motion for Relief from Automatic Stay (the "Stay Motion") of Wilmington Fund Savings Society, FSB ("Wilmington") filed with this Court on July 3, 2018 that is scheduled to be heard on July 31, 2018 and more specifically with respect to the assertions contained in the certification of Leslie Leanhart filed in support of the Stay Motion.

2. First and foremost, the Payoff Statement provided by Ms. Leanhart is inaccurate as it states that there have been significant escrow advances since the filing of Wilmington's Proof of Claim. To the contrary, I have been paying the real estate taxes on the property since such date.

3. Additionally, the equity analysis lists the “Estimated Fair Market Value” for our property at \$527,800 as of the original filing date of our petition. The valuation obtained by us that was submitted to the trustee was \$634,250.00.

4. Finally, the accrued interest calculation of \$265,043.00 is also inflated as it does not appear to credit us with the adequate protection payments that were made post-petition.

5. Even more significantly, a complete Loan Modification Application (“LMA”) has been submitted to Wilmington in accordance with our Chapter 11 Plan and is presently under review.

7. For all of the foregoing reasons I am respectfully requesting that this Court deny Wilmington’s Stay Motion to allow for the LMA to be reviewed and hopefully approved.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

Dated: July 24, 2018

/s/ Ernesto L. Arana
Ernesto L. Arana